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January 26, 2001

Docket Management Facility
USCG - 2000 - 6931 - 25
U. S. Department of Transportation
Room PL-401
400 Seventh Street S. W.
Washington, D.C. 20590-0001

RECEIVED
JAN 27 11:05
DEPT OF TRANSPORTATION

Re: Fire-Suppression Systems and Voyage Planning for Towing Vessels (#USCG2000-6931)

Dear Sirs:

The intent behind these regulations is to reduce the incidents of engine room fires, marine casualties, etc; but where is the data to support the need. I believe it is based on one incident of an engine room fire off the east coast of the U.S.; a "blue water" area.

I believe Voyage Planning for Towing Vessels is unnecessary and not applicable for vessels operating upon the nation's inland rivers. At no time are the vessels more than thirty minutes from shore. These vessels are never away from a shore facility for a long period of time. Their activities are dissimilar from ocean or blue water voyages and for that reason I feel the proposed regulations should never be applied to the Western Rivers. Blue Water regulations do not positively transfer to Brown Water conditions.

The river industry has spent millions of dollars over the past two years in adopting self regulation through the American Waterways Operators "Responsible Carrier" program and this regulation does not address any of our efforts to operate smartly and responsibly with the goal of being self regulated.

Further, the Coast Guard is trying to eliminate gasoline use in smaller engines involved in inland marine industry. Where are the incidents that would require this elimination? The river industry uses gasoline barge pumps as needed to remove excess water from barges and uses motor powered launches for crew changes and other navigation needs aboard the vessel. Here again, the Responsible Carrier Program has addressed gasoline storage.

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I am concerned about over regulation, fair application, and relief from the threat of federal sanctions requiring more unnecessary paperwork on our maritime operators. I would urge you to please reconsider and withdraw your proposed regulations.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Nelson Jones', with a long horizontal flourish extending to the right.

Nelson Jones,
President